

UNITED STATES DISTRICT COURT

FILED

for the

17 SEP 14 AM 11:32

Northern District of OhioEastern DivisionCLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

Case No.

1:17 CV 1939

(to be filled in by the Clerk's Office)

JUDGE BOYKO

Jury Trial: (check one) ☒ Yes ☐ NoBruce A. Hammock

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

OFFICER ROGERS, et al
In their Official and Individual
Capacity SEE ATTACHMENT-A

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Bruce A. Hammock

Street Address

P.O. Box 901

City and County

Leavittsburg, Trumbull

State and Zip Code

Ohio, 44430

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se I (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name	<u>Officer Rogers</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 2

Name	<u>Officer Ditttrich</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 3

Name	<u>Officer Garner</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 4

Name	<u>Officer Kingsborough</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 5

Name	<u>Officer Rhinehart</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 6

Name	<u>Officer Soehnlen</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 7

Name	<u>Officer Williams</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 8

Name	<u>Officer Stantz</u>
Job or Title (if known)	<u>Peace Officer/ Mansfield Police Dept.</u>
Street Address	<u>n/a</u>
City and County	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address (if known)	<u>n/a</u>

Defendant No. 9

Name John/Jane Doe A

Job or Title (if known) Correctional Officer, Richland County

Street Address n/a

City and County n/a

State and Zip Code n/a

Telephone Number n/a

E-mail Address (if known) n/a

Defendant No. 10

Name John/Jane Doe B

Job or Title (if known) Correctional Officer, Richland County

Street Address n/a

City and County n/a

State and Zip Code n/a

Telephone Number n/a

E-mail Address (if known) n/a

Defendant No. 11

Name John/Jane Doe

Job or Title (if known) Nurse

Street Address n/a

City and County n/a

State and Zip Code n/a

Telephone Number n/a

E-mail Address (if known) n/a

Defendant No. 12

Name Sgt. John Doe

Job or Title (if known) Correctional Officer, Richland County

Street Address n/a

City and County n/a

State and Zip Code n/a

Telephone Number n/a

E-mail Address (if known) n/a

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

FOURTH, FIFTH, EIGHTH, AND FOURTEENTH Amendment of the
United States Constitution.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Police brutality was the illegal concerted behavior of all officers named in claim. Plaintiff was removed from his vehicle via the driverside window, and thrown to the ground; Plaintiff was then handcuffed and dragged across the pavement; Plaintiff was then held and viciously beaten in to a state of unconsciousness while co defendants was present and did nothing to stop the atrocity; Plaintiff was then placed in the back of defendants cruiser, and struck yet again in the face by Officer Williams. Plaintiff was denied medical treatment at the scene of said violation, and upon arrival at the Richland Richland County Jail. See Attachment -B

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff request compensatory damages in the amount of \$1,000,000 per defendant. Plaintiff also request \$1,000,000 per defendant in punitive damages. Plaintiff suffered severe head trauma resulting in memory loss, frequent headaches, and occasional blurred vision which still presist.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Plaintiff suffers from PTSD as a result of the incident at bar. Plaintiff , suffers from severe anxiety, shaking of the hands, high blood pressure, and social detachment. Plaintiff also sustained injuries to the arm which caused a loss of feeling, and an inability to regain full mobility of the arm. Plaintiff has suffered a tremendous amount of personal humiliation and mental anguish as a result of the heinous acts depriving him of his constitutional rights. Plaintiff requests \$1,000,000 per defendant in compensatory damages—
~~SEE ATTACHED=C~~

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

9/12/2017

Signature of Plaintiff

Bruce A. Hammock

Printed Name of Plaintiff

Bruce A. Hammock

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address